

## **EXHIBIT 1**

ORIGINAL

VOLUME: II  
PAGES: 1 - 325  
EXHIBITS: 17 - 28

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,	)
Plaintiff,	)
vs.	)
	)
HUMANISTIC PSYCHOLOGY INSTITUTE,	)
d/b/a SAYBROOK INSTITUTE and	)
MAUREEN O'HARA, Individually,	)
Defendants.	)

AUDIOVISUAL DEPOSITION OF SUSAN COONEY, taken  
on behalf of the Saybrook Institute, pursuant to the  
Federal Rules of Civil Procedure, before Kristin L.  
Tucker, Notary Public and Certified Shorthand Reporter  
within and for the Commonwealth of Massachusetts, at the  
Law Offices of Morrison Mahoney LLP, 250 Summer Street,  
Boston, Massachusetts, on January 27, 2006, at 9:10  
a.m., as follows:

DANILECKI REPORTING  
234 Governors Road  
Quincy, Massachusetts 02169  
(617) 745-9786

1 Q. Setting aside the Saybrook '94/'95 Interim  
2 Catalog --

3 A. Yes.

4 Q. -- did Saybrook ever promise you that it  
5 would keep you informed of changes in licensing laws  
6 specifically?

7 A. When I went out to the orientation and I was  
8 supposed to bring my regulations, we met with that  
9 person who went over each person's regulations and she  
10 said that Massachusetts met the criteria and -- and she  
11 said, You're good to go.

12 Q. Is that all she said?

13 A. To the best of my recollection.

14 Q. What else, if anything, did that person say  
15 about future changes, if any, that might happen in  
16 Massachusetts?

17 A. Nothing that I can recall.

18 Q. Didn't she promise you that -- Didn't she say  
19 to you, We are going to track Massachusetts laws and  
20 keep you informed?

21 A. Did I say that?

22 MR. MORENBERG: Answer the question.

23 A. No.

24 Q. She never said that?

1 A. No.

2 Q. She never said anything to that effect; is  
3 that correct?

4 A. It was 11 years ago. I would say she  
5 basically said, You meet the criteria. We'd love to  
6 have you come here, and, you know, we understand you  
7 want to be a psychologist in Massachusetts and you'll be  
8 able to be.

9 Q. That's what she said?

10 A. Yes.

11 Q. Did she say to you that she would, or  
12 Saybrook would, monitor the regulations over the years  
13 that you would be at Saybrook and keep you informed?

14 A. It was an understanding.

15 Q. I didn't -- I know you -- Did she say that?

16 A. Did she specifically? I don't recall.

17 Q. She never said that as best you can recall,  
18 correct?

19 A. I can't recall. It was a long time ago. I  
20 can't recall specific conversation. The tone was  
21 that --

22 Q. I'm not interested --

23 A. -- they would be on top of it.

24 Q. I'm not interested in the tone. I'm

1 know what the changing Massachusetts rules are on  
2 licensing psychologists?

3 A. I have no way to know.

4 Q. What is the name of the person with whom you  
5 met at the 1995 residential conference?

6 A. I don't know. I have racked my brain.

7 Q. You racked your brain? Have you ever seen it  
8 written anywhere?

9 A. I've tried. I've tried really hard. I don't  
10 know. I know how important that is.

11 Q. Do you know if she was faculty?

12 A. I don't. I presumed that she was faculty,  
13 but she could have been student services, so I can't --  
14 I just can't say, and I know how important it is, and I  
15 just don't know.

16 Q. Do you know where she might be in the chain  
17 of command?

18 A. No.

19 Q. Do you know if she was a --

20 A. Doesn't Saybrook know? I mean, she went  
21 through everyone's at that orientation.

22 MR. MORENBERG: He asks the  
23 questions, remember. Okay?

24 THE WITNESS: All right. I'm sorry.

1 BY MR. VARTAIN:

2 Q. You don't know what level in the chain of  
3 command she was at?

4 A. I don't.

5 Q. You don't know how old she is?

6 A. (Witness shaking head.)

7 Q. Do you know how old she was then?

8 A. No.

9 Q. Do you know what she looked like?

10 A. This -- I was meeting so many new people, you  
11 know, I don't remember.

12 Q. Did you take any notes of the conversation  
13 with her at the time?

14 A. I don't believe so.

15 Q. Did you write down anything that she said?

16 A. Not to my knowledge.

17 MR. VARTAIN: I'm gonna propose we  
18 take our lunch break now.

19 THE WITNESS: Okay. Should we take  
20 that?

21 MR. VARTAIN: You take Exhibit 16  
22 and read that.

23 MR. MORENBERG: Actually, I have my  
24 own copy. Let's leave them together.